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September 16, 2020

VIA ECF:

The Honorable John G. Koeltl, U.S.D.J.
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *Wilmington Trust, National Association, as Trustee, etc. v. Winta Asset Management LLC and Shuigun Chen; Case No. 1:20-cv-05309-JGK*

Dear Judge Koeltl:

We represent plaintiff Wilmington Trust, National Association, as Trustee for the Registered Holders of Wells Fargo Commercial Mortgage Trust 2015-NXS2, Commercial Mortgage Pass-Through Certificates, Series 2015-NXS2 (“Plaintiff”), acting by and Rialto Capital Advisors, LLC, as Special Servicer under the Pooling and Servicing Agreement dated as of July 1, 2015, in this action. We submit this letter in furtherance of the Court’s September 10, 2020 Order which directs, if the Parties have not come to an agreement, Plaintiff to submit its proposed order with respect to its motion for the appointment of a receiver (the “Receivership Motion”).

Subsequent to a teleconference between counsel for Plaintiff and defendants Winta Asset management LLC and Shuigun Chen (collectively, “Defendants”) on September 14, 2020, Defendants provided Plaintiff with its counter-proposed Receivership Order. On September 15, 2020, the Parties discussed Defendants’ proposed changes.

Although the Parties were unable to come to a resolution on the entirety of the proposed receivership order, Plaintiff submits herewith an amended proposed receivership Order (the “Amended Order”), which incorporates some the changes requested by Defendants. Also attached for Your Honor’s reference, is a redline that reflects the changes between Plaintiff’s initial proposed Order (submitted in connection with the Receivership Motion) and the Amended Order.

We thank the Court for its consideration in this matter.

Respectfully submitted,

/s/ Keith M. Brandofino

Keith M. Brandofino

cc: All counsel of record (via ECF)